

From: Blanche, Todd
Sent: Tuesday, August 17, 2021 2:34 PM
To: 'Scott Matasar' <smatar@matasarjacobs.com>
Cc: Greenfield, Samantha <Samantha.Greenfield@cwt.com>; Mark Jacobs <mjacobs@matasarjacobs.com>; Jennifer Fleming <jffleming@matasarjacobs.com>
Subject: RE: IHT - Adam and Daniel Kaplan

Scott – It appears by your response to my request for a telephone conversation that you would rather spend your client's money in a back and forth over email and in writing as opposed to having a conversation over the telephone. Understood. I will respond in due course.

If you (or your client) would like to speak as opposed to emailing back and forth, today, tomorrow, or at any time in the future, please let me know.

Thanks,

Todd

From: Scott Matasar <smatar@matasarjacobs.com>
Sent: Tuesday, August 17, 2021 2:27 PM
To: Blanche, Todd <Todd.Blanche@cwt.com>
Cc: Greenfield, Samantha <Samantha.Greenfield@cwt.com>; Mark Jacobs <mjacobs@matasarjacobs.com>; Jennifer Fleming <jffleming@matasarjacobs.com>
Subject: RE: IHT - Adam and Daniel Kaplan

Todd:

It appears that certain of the items you wish to discuss touch upon areas of representation upon which other firms have previously indicated they represent the Kaplans. I cannot take my clients' valuable time having repetitious conversations with multiple law firms. I therefore again request you to advise whether or not you are now lead counsel for the Kaplans, and if not please delineate the scope of your representation.

With regard to the status of any investigation my client may be conducting into the Kaplans' activity, I will not be able to share that information with you for obvious reasons.

With regard to your request to retrieve an unspecified number of undefined hard copy documents, it is denied at this time. Those materials likely constitute books and records of IHT Wealth Management, such that the firm has a regulatory obligation to preserve custody of them. They also likely contain Personally Identifiable Information which may not be disclosed to the Kaplans pursuant to Regulation S-P. They may also contain information relevant to any investigation IHT may be conducting. Finally, your request is denied due to the risk of spoliation of evidence.

Regards,

Scott Matasar

Matasar Jacobs LLC

1111 Superior Ave., Suite 1355

Cleveland, OH 44114

Tel: 216.453.8180

Direct: 216.453.8181

Fax: 216.282.8600

smatasar@matasarjacobs.com

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MATASAR JACOBS

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From: Blanche, Todd <Todd.Blanche@cwt.com>
Sent: Tuesday, August 17, 2021 2:05 PM
To: Scott Matasar <smatar@matasarjacobs.com>
Cc: Greenfield, Samantha <Samantha.Greenfield@cwt.com>; Mark Jacobs <mjacobs@matasarjacobs.com>; Jennifer Fleming <jfleming@matasarjacobs.com>
Subject: RE: IHT - Adam and Daniel Kaplan

Scott: I am not sure how your interactions with the other counsel you have mentioned below have gone forward. But in my experience it is a professional courtesy to call and introduce yourself to counsel from the other side. Aside from those introductions, I am hoping to discuss the status of the on-going investigation that IHT is apparently conducting, as well as better understand the basis for the statements being made to current and former IHT clients about Adam and Daniel.

Finally, I want to arrange for the immediate retrieval of hard copy documents that belong to my clients currently located in the NY office. I will of course discuss your request of my clients re: LinkedIn referenced below with both Adam and Daniel.

Thanks,
Todd

From: Scott Matasar <smatar@matasarjacobs.com>
Sent: Tuesday, August 17, 2021 1:53 PM
To: Blanche, Todd <Todd.Blanche@cwt.com>
Cc: Greenfield, Samantha <Samantha.Greenfield@cwt.com>; Mark Jacobs <mjacobs@matasarjacobs.com>; Jennifer Fleming <jfleming@matasarjacobs.com>
Subject: RE: IHT - Adam and Daniel Kaplan

Todd:

Can you provide me some insight as to the purpose/agenda for the call before we set it up? And would you please confirm that your clients will be taking the corrective action required regarding their LinkedIn profiles?

Thanks.

Scott

From: Blanche, Todd <Todd.Blanche@cwt.com>
Sent: Tuesday, August 17, 2021 1:48 PM
To: Scott Matasar <smatar@matasarjacobs.com>
Cc: Greenfield, Samantha <Samantha.Greenfield@cwt.com>; Mark Jacobs <mjacobs@matasarjacobs.com>; Jennifer Fleming <jfleming@matasarjacobs.com>
Subject: Re: IHT - Adam and Daniel Kaplan

Scott, thank you for getting back to me. Please let me know if there is a convenient time today or tomorrow to have a conversation. I can circulate a dial-in to include others if helpful.

Thank you,

Todd

Todd Blanche

(c) 516-312-1860

(w) 212-504-6226

On Aug 17, 2021, at 1:30 PM, Scott Matasar <smatasar@matasarjacobs.com> wrote:

Todd:

By my count, yours is now the third law firm that has identified itself as representing the Kaplans in the past two weeks. Please let me know who is serving as lead counsel, so that I have a primary point of contact going forward.

Separately, please advise both of your clients to immediately update their LinkedIn profiles so that they no longer indicate they are associated with IHT Wealth Management. This representation is obviously false and misleading both to clients and the general public and must be corrected by the end of the business day tomorrow.

Regards,

Scott Matasar

Matasar Jacobs LLC

1111 Superior Ave., Suite 1355

Cleveland, OH 44114

Tel: 216.453.8180

Direct: 216.453.8181

Fax: 216.282.8600

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<image001.png>

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From: Blanche, Todd <Todd.Blanche@cwt.com>
Sent: Monday, August 16, 2021 2:41 PM
To: Scott Matasar <smatar@matasarjacobs.com>
Cc: Greenfield, Samantha <Samantha.Greenfield@cwt.com>; Daniel Kaplan <daniel.evan.kaplan@gmail.com>; Adam Kaplan <adam.scott.kaplan@gmail.com>
Subject: IHT - Adam and Daniel Kaplan

Scott,

My name is Todd Blanche. I represent Adam and Daniel Kaplan. I have reviewed the correspondence you previously sent and received from Sher Tremonte LLP, and would like to speak with you at your earliest convenience. The best way to reach me is by cell phone: 516-312-1860.

Thank you,

Todd

Todd Blanche

Partner

Cadwalader, Wickersham & Taft LLP

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